

# Steve Zissou & Associates

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December 26, 2021

**BY ECF**

The Honorable Sterling Johnson, Jr.  
United States District Judge  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Elijah Song*, Docket No. 21-CR-89 (SJ)  
Unopposed Request to Reschedule Sentencing Hearing

Dear Judge Johnson:

For the reasons set forth below, I respectfully request that the sentencing hearing in this case be rescheduled. The current date is January 6, 2022. The guilty plea was entered on September 1, 2021. The defense received the presentence report on December 8, 2021. This is the first request to reschedule the sentencing hearing.

There are several parts of the presentence report about which the defendant has concerns and it remains to be seen whether these issues can be resolved without filing objections. The parties have resolved at least one and remain hopeful that the other can be as well. The additional time will allow the parties an opportunity to do so and also to provide the Court with relevant sentencing factors pursuant to 18 USC 3553(a). This should assist the Court in deciding upon a sentence that is “sufficient but not greater than necessary” in this case.

I have discussed this request with the attorney for the government, Andrew P. Wenzel, and he advised me that the government does not object to rescheduling the sentence. The dates of February 1 and 3, 2022 are available for the government and the defense. Or if those date are unavailable, a later date that is more convenient to the Court

Thank you for your consideration in this matter

Respectfully submitted by

Steve Zissou

cc: [andrew.wenzel@usdoj.gov](mailto:andrew.wenzel@usdoj.gov)